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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Amendment of Section 73.202(b))	MB Docket No. 05-136
Table of Allotments)	RM-11163
FM Broadcast Stations)	
(Arapaho, Oklahoma))	

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

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MAY 10 2005

Federal Communications Commission
Office of Secretary

COUNTERPROPOSAL

CITADEL BROADCASTING COMPANY

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May 10, 2005

SUMMARY

In this Counterproposal, Citadel Broadcasting Company proposes to upgrade and relocate its Station KKWD(FM) from Edmond, Oklahoma to The Village, Oklahoma, as that community's first local service. In order to achieve this upgrade and relocation, several other stations must make changes to their facilities. Agreements have been reached with the licensees of Stations KPNC(FM), Ponca City, Oklahoma and KWOX(FM), Woodward, Oklahoma regarding changes to their facilities. These two licensees have furnished statements consenting to modify their facilities. With respect to Station KVRO(FM), Stillwater, Oklahoma, Citadel requests that the Commission issue an Order to Show Cause to show why that station's channel should not be changed. A small change to a vacant allotment at Hennessey, Oklahoma, and a change to Citadel's own station KATT-FM, Oklahoma City, Oklahoma, complete the modifications necessary to implement the proposal.

The Village, Oklahoma is an independent community in the Oklahoma City Urbanized Area deserving of a first local service. Edmond, Oklahoma will retain local service. Although this Counterproposal is mutually exclusive with the petitioner's request for a first local service at Arapaho, Oklahoma, the Commission should prefer this Counterproposal because it would provide a first local service to a much larger community. In addition, grant of the Counterproposal will result in a net gain in radio service to 382,639 people.

Accordingly, Citadel requests that the Commission promptly issue an Order to Show Cause as requested herein, and process and grant this Counterproposal.

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COUNTERPROPOSAL

Citadel Broadcasting Company ("Citadel"), licensee of Stations KKWD(FM), Edmond, Oklahoma, and KATT-FM, Oklahoma City, Oklahoma, by its counsel, hereby submits this counterproposal to the *Notice of Proposed Rule Making*, DA 05-78 (rel. March 23, 2005) ("*NPRM*") in the above-captioned proceeding. Citadel proposes to change the channel and class of KKWD from Channel 250A to 251C1, relocate the station to a new transmitter site, and change its community of license to The Village, Oklahoma. In order to accomplish these changes, the following amendments to the FM Table of Allotments are requested (listed alphabetically):

Community	Channel	
	Existing	Proposed
Edmond, OK	250A	----
Oklahoma City, OK	223C, 234C, 241C, 255C, 263C, 270C, 274C, 281C, 299C	223C, 234C, 241C, 255C, 263C1, 270C, 274C, 281C, 299C
Ponca City, OK	257A, 265A, 284C3	257A, 264C3, 284C3
Stillwater, OK	229C2, 251A, 288A	229C2, 266A, 288A
The Village, OK	--	251C1

In support whereof, Citadel states as follows:

I. PRELIMINARY MATTERS

1. Citadel has reached agreement with the licensees of all but one of the affected stations for the changes proposed herein. The consent statements of the licensees of Stations KPNC(FM), Ponca City, Oklahoma and KWOX(FM), Woodward, Oklahoma are attached hereto as Exhibit A. The underlying agreements provide that Citadel will reimburse the licensees for their expenses in making the changes, and Citadel hereby states that it will do so. Citadel itself is the licensee of KATT-FM, Oklahoma City, Oklahoma, which also must make changes to accommodate the KKWD(FM) upgrade. With respect to the remaining station, Citadel requests that the Commission issue an Order to Show Cause to Stillwater Broadcasting, LLC, the licensee of Station KVRO(FM), Stillwater, Oklahoma, to show why its channel should not be changed from 251A to 266A at its current site. Citadel hereby states that it will reimburse the licensee for its reasonable expenses in changing channel and/or transmitter site in accordance with *Circleville, Ohio*, 8 FCC 2d 159 (1967). Thus, this proposal complies with the Commission's policy in *Columbus, Nebraska*, 59 RR 2d 1185 (1986).

2. Citadel also states that it will apply for Channel 251C1 at The Village, Oklahoma and construct the facilities if the Commission grants this proposal. Citadel hereby states that pursuant to Section 1.420(j), it has not paid nor promised to pay, in any agreement, any licensee, permittee or applicant for withdrawing an expression of interest, dismissing an application or forbearing to file an expression of interest or application.

II. CONFLICT WITH THE *NPRM*

3. As indicated in the attached Engineering Statement, this proposal, which would result in the allotment of Channel 251C1 to The Village, Oklahoma, conflicts with the *NPRM* proposal to allot a first local service to Arapaho, Oklahoma on Channel 251C3. The Commission should favor a first local service to The Village (2000 U.S. Census pop. 10,157)

over a first local service to Arapaho (2000 U.S. Census pop. 748) under its FM priorities. *See Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982); *Blanchard, Louisiana and Stephens, Arkansas*, 10 FCC Rcd 9828 (1995) (population is the deciding factor between proposals advancing priority 3).

III. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES

A. STATION KKWD(FM), THE VILLAGE, OKLAHOMA

1. Technical Studies

4. As indicated in the attached channel study, Exhibit E, Figure 1, Channel 251C1 can be allotted to The Village in compliance with the Commission's spacing rules provided that changes are made at Stillwater and Hennessey, Oklahoma.¹ Those changes, and the other modifications they require in turn, will be discussed below. From the proposed site the station will provide a 70 dBu signal to The Village. *See* Figure 2.

2. Change in Community of License

5. In *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License* ("Community of License"), 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990), the Commission stated that in order to grant a change in community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities.

¹ The channel study shows a short spacing to a proposal for Channel 249A at Purcell, Oklahoma, that was dismissed in MM Docket 00-148. That docket is still pending on application for review. However, under the policy set out in *Auburn, Alabama, et al.*, 18 FCC Rcd 10333, 10340-41 (2003), a rule making decision may be relied by future rule making proponents during the pendency of any appeal proceedings. The channel study also shows short spacings to a proposal for Channel 251A at Maysville, Oklahoma and a proposal for Channel 251A at Cromwell, Oklahoma in MB Docket No. 04-404. The expressions of interest in these channels have been withdrawn.

6. Here, the attached channel study, Figure 1, demonstrates that the proposed allotment of Channel 251C1 at The Village is mutually exclusive with the current allotment of Channel 250A at Edmond. Edmond will retain existing local service, because Stations KCSC(FM) and KOKF(FM) will remain licensed to Edmond. The provision of a first local service at The Village (pop. 10,157) under priority (3) is preferred over the provision of a third local service to Edmond (2000 pop. 68,315) under priority (4). *See, e.g., Russellville and Littleville, Alabama*, 19 FCC Rcd 6853 (2004). The allotment of Channel 251C1 to The Village will result in a gain in 60 dBu service to 390,898 people. *See* Figure 3. There is no loss area as a result of the relocation. *See* Figure 3.

7. Both The Village and Edmond are located within the Oklahoma City Urbanized Area. Therefore, this relocation does not implicate the Commission's policy concerning the migration of stations from underserved rural areas to well-served urban areas. *See Boulder and Lafayette, Colorado*, 11 FCC Rcd 3632 (1996) (granting a proposal to reallocate a channel from one community in an Urbanized Area to another community in same Urbanized Area without a *Tuck* showing); *East Los Angeles, Long Beach and Frazier Park, California*, 10 FCC Rcd 2864 (1995) (stating that the concern with migration to Urbanized Areas does not exist when a proposal involves reallocating a channel from one community in an Urbanized Area to another community in same Urbanized Area). Nevertheless, a *Tuck* showing is included in order to demonstrate the independence of The Village from Oklahoma City.

8. The Village is located 9.78 kilometers from Oklahoma City. Its population (10,157) is 2% of the population of Oklahoma City (506,132). From the proposed reference point, a station will place a signal over 100% of the Oklahoma City Urbanized Area. However, evidence of independence is the most important criterion. The following discussion of the eight factors demonstrates the independence of The Village:

(1) *Extent to which the residents of The Village work in The Village.*

According to the 2000 U.S. Census, the population of The Village was 10,157. According to 2000 Census figures, 675 of the 5,377 employed individuals in The Village, or 12.6%, work at their place of residence. See Exhibit B. This percentage compares favorably with other independent communities. See, e.g., *Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876 (2001) (11.3% of working-age residents worked in community); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996) (13% of Gilbert's working population actually worked in Gilbert).

(2) *Newspapers and other media that cover The Village's local needs and interests.* According to David Weissenbuehler of The Village Library, The Village is served by a local newspaper, *The Friday*. Published each Friday, *The Friday* newspaper covers the local needs and interests of the communities to the northwest of Oklahoma City, including The Village. The paper contains advertisements from the local businesses. The Village also operates a website <www.thevillage.org> that citizens can access for information about the city, local events, city meetings and agenda, and other items. See Exhibit B.

(3) *Community leaders and residents perceive The Village as being separate from Oklahoma City.* The Village is located in central Oklahoma on lands that were not given to any of the Five Civilized Tribes and became known as the "Unassigned Lands." The area that became The Village was settled during the Oklahoma Land Run of 1889 by eleven families. Follow a period of rapid post-World War II growth, The Village was incorporated in January 24, 1950 as a town. On February 10, 1950, the citizens of The Village elected its first governing body. During this period, there were several efforts in the Oklahoma City business community and government to expand its city borders. To

counter the fear that Oklahoma City would annex The Village, The Village held an election to approve a city charter that resulted in the elevation of the status of The Village as a city. This demonstration of independence and self-identity is elaborated in the city website on the history of the City:

“...Oklahoma City actively engaged in lobbying efforts to amend the state annexation laws to their advantage. In this context, it is easy to understand why local leaders felt threatened and subsequently sought to consolidate and strengthen the community’s independence by vigorously opposing Oklahoma City’s lobbying efforts and by pushing for [The Village] to become a city in its own right.”

The Village grew extensively in the 1960s as result of development and influx of people. The community has since grown from its small beginnings to its present population of 10,157. *See Exhibit B.*

(4) *The Village has its own local government and elected officials.* The Village operates independently of any other government and operates under a Council and Manager form of governance under a Home Rule Charter. According to Bruce Stone, Chief Executive Office of the City, the City Council consists of 5 members who each serve two-year terms. The City Council selects a Mayor and a Vice Mayor who each serve one-year terms. In addition to these elected positions, the Mayor and Council appoint officials who are responsible for the daily administration of The Village such as the Chief Executive Officer. The Chief Executive Officer is responsible for the execution of the laws, ordinances and policies of the City, administers the affairs of the municipal government and prepares the annual budget. The city council acts on the proposed budget. The Village government has 16 departments including Council Manager, Legal Finance, Engineering, Public Works, Municipal Court, Police and Fire. The Public Works Department is responsible for the sewer system and the streets and

parks. Among the services provided by the City includes garbage pickup, recycling, street repair, public safety, parks and recreation and sewer line maintenance. *See Exhibit B.*

(5) *The Village has its own post office and governmental phone listings.*

The zip code assigned to The Village is 73120, which is shared with Oklahoma City. According to Mr. Stone, the U.S. Postal Service operates a branch office in The Village and all mail addressed to The Village is processed and delivered from this branch. *See Exhibit B.* According to Mr. Weissenbuehler, Yellow Book publishes a directory which provides separate governmental listings for The Village.

(6) *The Village has its own commercial establishments and health facilities.*

According to Mr. Stone, The Village is home to approximately 300 businesses. Love's County Store's corporate headquarters is located in The Village. The Hertz Reservation Center is located in The Village and is the City's largest employer with 1200 employees. A number of local businesses identify with the community by using "Village" in their names, including Village Style Shop, Village Package Store, Village Store Shell, Village Plumbing and Village Quality Food, Inc. Other retail and commercial businesses located in The Village include Wal-Mart Neighborhood Market, Mill Creek Design Center, Westlake Hardware, Raspberries N' Creme, Paul's Conoco, Zeigler's Shoe Repair, and CVS Pharmacy. *See Exhibit B.*

A number of health care providers are located in The Village, including Village Family Dental Care, My Dentist, and several Lasik surgery centers. Churches in The Village include Village United Methodist Church, Village Christian Church and Village Baptist Church. Civic organizations include Kiwanis Club No. K04407. *See Exhibit B.*

(7) *The Village is a separate and distinct advertising market from Oklahoma City. The Friday*, a weekly community newspaper, provides the businesses of The Village with a place to advertise to the residents of The Village without relying on the larger Oklahoma City advertising market.

(8) *The Village has its own schools, library, police department and fire department.* The Metropolitan Library System operates The Village Library in The Village. The Village Library makes reading materials and public reference materials available to the community. The library offers many activities and special programs for the entire family including story hours and arts and crafts for children and adult programs throughout the year. *See Exhibit B.*

According to Mr. Stone, education in The Village is provided through the Oklahoma City Independent School District I-89 and by three private schools that are located in The Village.

The City of The Village provides its own police services and fire protection. The Village Fire Department has a Fire Chief, Deputy Chief, Fire Marshall, three Captains and twelve firefighters offering several emergency and non-emergency services. The Village Police Department is composed of a Chief of Police, Deputy, twenty-one officers and six dispatchers. *See Exhibit B.*

9. Citadel reiterates that as the licensee of KKWD(FM), it will apply for Channel 251C to serve The Village and construct the facility if a permit is granted.

B. STATION KVRO(FM), STILLWATER, OKLAHOMA

10. In order to allot Channel 251C1 to The Village, Oklahoma, Station KVRO(FM), Stillwater, Oklahoma, must change its channel to from 251A to 266A. Channel 266A can be allotted to Stillwater at KVRO(FM)'s currently licensed site provided that changes are made at

Ponca City, Woodward, and Oklahoma City, Oklahoma as discussed below. *See* Exhibit E, Figure 4.

11. As stated previously, should the Commission adopt this proposal and substitute Channel 266A for Channel 251A at Stillwater, Oklahoma, Citadel will reimburse the licensee for its reasonable expenses in changing channels. However, since no agreement has been reached, it will be necessary to issue an Order to Show Cause to Stillwater Broadcasting, LLC, the licensee of KVRO(FM), in order to change its channel.

C. STATION KPNC(FM), PONCA CITY, OKLAHOMA

12. In order to allot Channel 266A to Stillwater, Station KPNC(FM), Ponca City, Oklahoma, must change from Channel 265A to Channel 264C3 and relocate its transmitter site. Channel 264C3 can be allotted to Ponca City at new reference coordinates in compliance with the Commission's spacing rules provided that Station KATT-FM downgrades as discussed below. *See* Figure 5. From the new transmitter site, KPNC(FM) will place a 70 dBu contour over Ponca City. *See* Figure 6. The allotment of Channel 264C3 to Ponca City will result in a net gain in 60 dBu service to 21,673 people. *See* Figure 7. Citadel has entered into an agreement with the licensee of KPNC(FM) regarding the changes. The licensee's consent is attached hereto in Exhibit A. Citadel reiterates that it will reimburse the licensee for its expenses in making the changes.

D. STATION KWOX, WOODWARD, OKLAHOMA

13. In order to allot Channel 266A to Stillwater, Station KWOX(FM), Woodward, Oklahoma, must relocate its transmitter site. Channel 266C can be allotted to Woodward at new reference coordinates in compliance with the Commission's spacing rules. *See* Figure 8. From the new transmitter site, KWOX(FM) will place a 70 dBu contour over Woodward. *See* Figure 9. A gain-loss study is attached. *See* Figure 10. Citadel has entered into an agreement with the

licensee of KWOX(FM) regarding the transmitter site change. The licensee's consent is attached hereto in Exhibit A. Citadel reiterates that it will reimburse the licensee for its expenses in making the changes. A change in transmitter site reference coordinates is explicitly permitted under *Gunnison, Colorado, et al.*, 20 FCC Rcd 5908 (2005).

E. STATION KATT-FM, OKLAHOMA CITY, OKLAHOMA

14. Citadel has agreed to downgrade its Station KATT-FM from Channel 263C to 263C1 as part of this rule making proposal, in order to provide clear spacing to Stations KPNC(FM) and KVRO(FM). Channel 263C1 can be allotted to Oklahoma City at KATT-FM's current site in compliance with the Commission's spacing rules. *See* Figure 11. The station will continue place a 70 dBu contour over all of Oklahoma City. *See* Figure 12. A gain-loss study is also attached. *See* Figure 13.

F. CHANNEL 249A, HENNESSEY, OKLAHOMA

15. As a final matter, the relocation of KKWD(FM) from Edmond to The Village requires that the allocation reference coordinates for the vacant Channel 249A allotment at Hennessey, Oklahoma be modified by a small amount. Channel 249A can be allotted to Hennessey at new reference coordinates approximately 4 km northwest of the current reference coordinates consistent with the Commission's spacing rules. *See* Figure 14. From the proposed reference coordinates, the facilities will place a 70 dBu contour over Hennessey. *See* Figure 15.

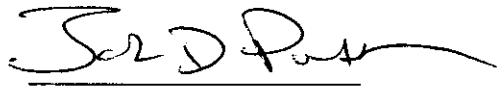
16. The change of coordinates was proposed in the Hennessey proceeding (MB Docket No. 05-85). The petitioner in the that proceeding has consented to the modification of the reference coordinates for the proposed Hennessey allotment. A copy of the pleading and consent are attached hereto. *See* Exhibit C.

IV. CONCLUSION

18. Grant of this Counterproposal is in the public interest because it will provide a new first local service at The Village, a city with a substantial population of 13,176. This Counterproposal will also result in a net gain in radio service to 382,639 people. See Figure 16. Edmond will retain local service, and any loss areas will remain well served. Citadel is confident that the changes can be implemented smoothly with a minimum of disruption. Accordingly, the Commission should grant this Counterproposal.

Respectfully submitted,

CITADEL BROADCASTING COMPANY

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Its Counsel

May 10, 2005

EXHIBIT A

EXHIBIT A

**Station KPNC
Ponca City, Oklahoma**

Team Radio, LLC ("Licensee"), licensee of Station KPNC, Ponca City, Oklahoma, hereby agrees to have Station KPNC's class of channel changed from Channel 265A to 264C3 and its transmitter site relocated. Licensee will file an application consistent with the Rules of the Federal Communications Commission if the changes are approved. Licensee understands that this statement may be used in a filing with the Federal Communications Commission and hereby authorizes its use for that purpose.

I verify that this statement is true and accurate to the best of my knowledge, information and belief and is made in good faith.

TEAM RADIO, LLC

By:  _____

Its: _____

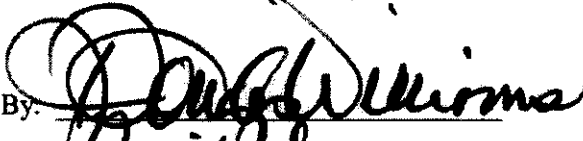

EXHIBIT A

**Station KWOX
Woodward, Oklahoma**

Omni Communications, Inc. ("Omni"), licensee of Station KWOX, Woodward, Oklahoma, hereby consents, under the conditions set forth below, to have Station KWOX's transmitter site relocated on Channel 266C. The foregoing consent is specifically conditioned on the grant by the Commission of the accompanying rule making proposal, of which this consent is an integral part, in its totality. Should any part of the rule making proposal be dismissed or denied, this consent is invalid. Should the rule making proposal, including the foregoing changes, be approved in its totality, Omni will file an application consistent with the Rules of the Federal Communications Commission to implement the changes. Omni understands that this statement may be used in a filing with the Federal Communications Commission and hereby authorizes its use for that purpose.

I verify that this statement is true and accurate to the best of my knowledge, information and belief and is made in good faith.

OMNI COMMUNICATIONS, INC.

By: 
Its:  President



**ENGINEERING STATEMENT
IN SUPPORT OF A
COUNTERPROPOSAL**

MB Docket 05-136, RM-11163

**Citadel Broadcasting Company
(KKWD, The Village, Oklahoma)**

Prepared by:

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May, 2005

**ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL**

MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

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ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL

MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

INTRODUCTION

This engineering statement is submitted in support of a counterproposal in MB Docket 05-136. The instant counterproposal is filed by Citadel Broadcasting Company ("Citadel"), licensee of KKWD (FM) licensed to Edmond, OK. Currently KKWD operates on channel 250A. Citadel proposes to delete channel 251A at Edmond and allocate channel 251C1 at The Village, OK for use by KKWD. Channel 251C1 at The Village is mutually exclusive with the proposed allotment of channel 251C3 at Arapaho, OK. Therefore, the Citadel counterproposal is qualified to be considered as MX with the Arapaho NPRM.

In order to allocate channel 251C1 at The Village, certain additional spectrum changes are required. The methodology for this allotment is discussed with KKWD used as the starting reference. Subsequent changes are discussed as their need for modifications are shown. The strength of the Citadel counterproposal, in comparison to the NPRM for channel 251C3 at Arapaho is depicted in the final exhibit, the 'Cumulative Gain/Loss Study.'

Table 1 is an abbreviated depiction of the Citadel counterproposal that seeks to delete channel 250A at Edmond and allot it to The Village on channel 251C1. The table includes both the before and after listing of FM channels currently in use in each pertinent community. A one sentence statement is included explaining the basic change required to each Community's allotments.

The Methods section will explain the Citadel KKWD upgrade scenario including both primary and secondary spectrum changes required to meet spacing requirements.

Exhibits Explained describes each exhibit and how it documents the requirements proposed in the Methods section. Finally, the Conclusion section uses all of the gain/loss data compiled in the pertinent exhibits to verify that the Citadel counterproposal is superior to the NPRM.

It should be noted that the instant Citadel Counterproposal is mutually exclusive to the proposed allotment at Maysville, OK and the ensuing counterproposal to Maysville that proposed the allotment to Cromwell, OK. Neither of these entries are of any concern in the The Village counterproposal since all three parties in the Maysville proceeding (MB Docket 04-404) have withdrawn their expressions of interest. See the instant Citadel Counterproposal legal section.

METHODS

- I. Channel 251C1 The Village, OK (KKWD) – In order for channel 251C1 to be allocated to The Village, the MX channel 250A allotment at Edmond must be deleted. This deletion will not leave Edmond without local service. NCE channels 211C1 and 215C1 are both currently in use at Edmond. Using the proposed Citadel reference for channel 251C1 at The Village, it creates a short space of 124.33 kilometers to the licensed facility of KVRO, channel 251A at Stillwater, OK. Citadel proposes to correct this short space by providing a substitute channel at Stillwater.
- A. Channel 266A Stillwater, OK (KVRO) - Currently KVRO operates on channel 251A licensed to Stillwater. Citadel proposes to offer channel 266A at the licensed site of KVRO. The use of 266A as a replacement channel at Stillwater creates three short spacings; 1) 21.83 kilometers to KPNC, channel 265A Ponca City, OK,

2) 20.46 kilometers to KWOX, channel 266C at Woodward, OK and 19.33 kilometers to KATT, channel 263C at Oklahoma City, OK.

- 1) Channel 264C3 Ponca City, OK (KPNC) – Presently KPNC operates on channel 265A. The short space between KVRO on channel 266A and KNPC on channel 265A is to be eliminated by substituting channel 264C3 for channel 265A and changing the antenna site. Channel 264C3 is MX with channel 265A at Ponca City and the C3 upgrade of KPNC is possible only due to the proposed modification to KATT discussed below. Therefore, the KATT modification contributes twice in the instant counterproposal.
- 2) Channel 266C Woodward, OK (KWOX) - Currently KWOX operates on channel 266C at Woodward. Citadel proposes to modify KWOX to a site which fully spaces channel 266A at Stillwater. This requires a site reference modification of 24.51 kilometers. These modifications to channel 266C at Woodward eliminate all short spacing to the allotment of channel 266A at the licensed site of KVRO.
- 3) Channel 263C Oklahoma City, OK (KATT) - Currently KATT operates on channel 263C with an outstanding trigger for channel 263C0. Citadel proposed to reclassify KATT from channel 263C to channel 263C1 at its present site. This reclassification of channel 263 eliminates all short spacing to the use of channel 266A at the licensed site of KVRO and also allows for the upgrade of KPNC on channel 264C3.

B. Channel 249A Hennessey, OK (ADD 249A) - Channel 251C1 at The Village creates a short space of 3.49 kilometers to the proposed allotment of channel 249A at Hennessey. This conflict can be eliminated by changing the reference

coordinates 3.49 kilometers northwest of the existing reference. Citadel proposed this allotment reference modification in MB Docket 05-85 with the consent of the petitioner for channel 249A at Hennessey. No additional spectrum changes are required to make this change.

Note: Other apparent short spacings appear in the channel study for 251C1 at The Village. They are; 1) Maysville, OK channel 251A. As discussed earlier, the instant Citadel counterproposal would be MX with the NPRM for this channel. However, the petitioners for the Maysville allotment, an additional expression of interest, and the subsequent counterproposal at Cromwell, have all been withdrawn. See the legal section of the instant counterproposal for explanation. 2) Arapaho, OK channel 251C3. Since it appears that there are no substitute channels for the NPRM's 251C3 at Arapaho, the Commission must decide between it and channel 251C1 at The Village proposed in the instant counterproposal. The merits of channel 251C1 at The Village are discussed in the legal section of the instant counterproposal. 3) KJMX Lawton, OK. This channel was deleted in MM Docket 01-293 and reallocated to Cache, OK on channel 250A. Therefore, in the Citadel counterproposal it is of no concern. All other apparent short spacings are errant entries

EXHIBITS EXPLAINED

KKWD

Exhibit E, figure 1 is an allocation study using the Citadel allotment reference for channel 251C1 at The Village. It demonstrates the short spacings this allotment creates and the methods Citadel proposes to eliminate them. Exhibit E, figure 2 is a 70 dbu contour map for a maximum class C1. It certifies compliance with §73.315 of the Rules concerning 70 dbu service to the entire community of The Village. Exhibit E, figure 3 is a gain/loss map for KKWD using the hypothetical 60 dbu contours of channel 250A at Edmond and channel 251C1 at The Village.

Since there is no loss area outside the gain area, no remaining services studies were necessary. The results of figure 3 are shown on the map and in Exhibit E, figure 16.

KVRO

Exhibit E, figure 4 is an allocation study for channel 266A at the licensed site of KVRO. It demonstrates the short spacings this substitution creates. It also provides methods used by Citadel to eliminate them. Since there are no technical changes proposed for KVRO, no additional studies are required.

KPNC

Exhibit E, figure 5 is an allocation study for the substitution of channel 264C3 for channel 265A at Ponca City. It shows that the proposed upgrade of KPNC is MX with the licensed facility of KPNC and that the proposed Citadel modification of KATT makes this substitution possible.

Exhibit E, figure 6 is a 70 dbu contour map for a maximum class C3. It certifies compliance with §73.315 of the Rules concerning 70 dbu service to the entire community of Ponca City. Exhibit E, figure 7 is a gain/loss map for KPNC using the hypothetical 60 dbu contours of channel 265A and channel 264C3. Since no change in community of license is proposed, a remaining services study is not included. The results of the gain/loss areas and population in this modification are included on the map in Exhibit E, figure 16.

KWOX

Exhibit E, figure 8 is a channel spacing study for channel 266C at Woodward. It shows that when KWOX continues to be allotted to Woodward as a class C, and the reference site is modified, the short spacing to channel 266A at the licensed site of KVRO is eliminated. Exhibit E, figure 9 is a 70 dbu contour map for a maximum class C. It certifies compliance with §73.315 of the Rules concerning 70 dbu service to the entire community of Woodward. Exhibit E, figure 10 is a gain/loss map for KWOX using the hypothetical 60 dbu contours of channel 266C (licensed

technical facilities only) and channel 266C (maximum class C facility). Since no change in community of license is proposed, a remaining services study is not included. The results of the gain/loss areas and population in this modification are included on the map in Exhibit E, figure 16.

KATT

Exhibit E, figure 11 is a channel spacing study for channel 263C1 at Oklahoma City. It shows that when KATT is reclassified to a class C1 with no reference site modification, the short spacing to channel 266A at the licensed site of KVRO is eliminated. Exhibit E, figure 12 is a 70 dbu contour map for a maximum class C1. It certifies compliance with §73.315 of the Rules concerning 70 dbu service to the entire community of Oklahoma City. Exhibit E, figure 13 is a gain/loss map for KATT using the hypothetical 60 dbu contours of channel 263C (licensed technical facilities only) and channel 263C1 (maximum class C1 facility) both licensed to Oklahoma City. Since no change in community of license is proposed, a remaining services study is not included. The results of the gain/loss areas and population in this modification are included on the map in Exhibit E, figure 16.

ADD 249A

Exhibit E, figure 14 is an allocation study for channel 249A for the proposed allotment at Hennessey, OK. It depicts that when the Citadel proposed modified site is used the short spacing to channel 251C1 at The Village is eliminated. Exhibit E, figure 15 is a 70 dbu contour map for a maximum class A. It certifies compliance with §73.315 of the Rules concerning 70 dbu service to the entire community of Hennessey. Since no service currently exists for channel 249A at Hennessey a gain/loss area map is omitted.

CITADEL COUNTERPROSAL

Exhibit E, figure 16 is a compilation of the gains and losses of the various spectrum modifications proposed in the Citadel Counterproposal. Each station is listed with both the area and population gain and loss. The instant counterproposal realizes a net area gain of 22, 153 square kilometers and a population gain of 382,639 persons. In addition, it proposes a new first local service to The Village, OK, a community of 10, 157 persons.

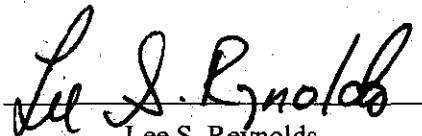
STATEMENT OF THE CONSULTANTS

The instant engineering portion of a counterproposal was prepared for Citadel Broadcasting Company, licensee of KKWD, channel 250A, Edmond, Oklahoma. It supports a counterproposal to MM Docket 05-136, RM-11163. It was developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to the Commission by Citadel.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:



Lee S. Reynolds

May 10th, 2005

12585 Old Highway 280 East, Suite 102
Chelsea, Alabama 35043
(205) 618-2020

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
Edmond, OK	211C1, 215C1, 250A	211C1, 215C1	Delete Channel 250A (KKWD) & change community of license.
The Village, OK	-----	251C1	Add channel 251C1 (KKWD) as first local service for MX Ch 250A Edmond.
Stillwater, OK	219C, 229C2, 251A , 288A	219C, 229C2, 266A , 288A	Delete Channel 251A & substitute Channel 266A at KVRO licensed site.
Ponca City, OK	204C3, 209C0, 257A, 265A , 284C3	204C3, 209C0, 257A, 264C3 , 284C3	Delete Channel 265A & substitute Channel 264C3 with site change (KNPC).
Woodward, OK	201C, 214A, 221C3, 228A, 240A, 261C1, 266C , 272A, 291C1	201C, 214A, 221C3, 228A, 240A, 261C1, 266C , 272A, 291C1	Modify Channel 266C reference coordinates to a site that is fully spaced to the substitution of 266A at KVRO Stillwater.
Oklahoma City, OK	205C3, 223C, 234C, 241C, 255C, 263C , 270C, 274C, 281C, 299C	205C3, 223C, 234C, 241C, 255C, 263C1 , 270C, 274C, 281C, 299C	Delete Channel 263C & substitute Channel 263C1 at KATT-FM licensed site.
Hennessey, OK	249A	249A	Change of reference coordinates only.

Table 1

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

ADD 251C1 The Village, OK - (KKWD)

(Deleting Ch 250A at Edmond and allotting Ch 251C1 The Village, OK)

REFERENCE		DISPLAY DATES
35 35 22 N	CLASS = C1	DATA 05-03-05
97 29 03 W	Current Spacings	SEARCH 05-04-05
----- Channel 251 - 98.1 MHz -----		
Call	Channel	Location
		Dist
		Azi
		FCC
		Margin

Community of	The Village	OK 6.84 241.9
Reference Coordinates:		
North Latitude: 35-23-03		
West Longitude: 97-43-27		
KKWD LIC 250A Edmond	OK 2.63	213.6 133.0 -130.37
Of No Concern:		
Licensed facility of KKWD before proposed modification		
KVRO LIC 251A Stillwater	OK 75.67	22.3 200.0 -124.33
Of Concern:		
Substitution of Ch 266A proposed at site		
RADD ADD 251A Maysville	OK 86.04	175.2 200.0 -113.96
Of Concern:		
MX with instant counterproposal but was withdrawn by initial petitioner		
KJMZ LIC 251C1 Lawton	OK 136.19	215.7 245.0 -108.81
Of No Concern:		
Channel deleted in MB Docket 01-293		
RADD ADD 251A Cromwell	OK 96.81	104.8 200.0 -103.19
Of Concern:		
MX with instant counterproposal but was withdrawn by initial petitioner		
RADD ADD 251C3 Arapaho	OK 130.64	264.4 211.0 -80.36
Of Concern:		
Mutually Exclusive with the Citadel Broadcasting Company counterproposal		
<u>This is the MX point with the instant Counterproposal</u>		
AP252 APP 252C1 Kiowa	KS 156.86	323.8 177.0 -20.14
Of No Concern:		
Applicant unsuccessful in auction #37		
RADD ADD 249A Hennessey	OK 71.06	323.5 75.0 -3.94
Of Concern:		
Site modification proposed. See Hennessey below.		
MM Docket MB 05-85		

Continued on next page

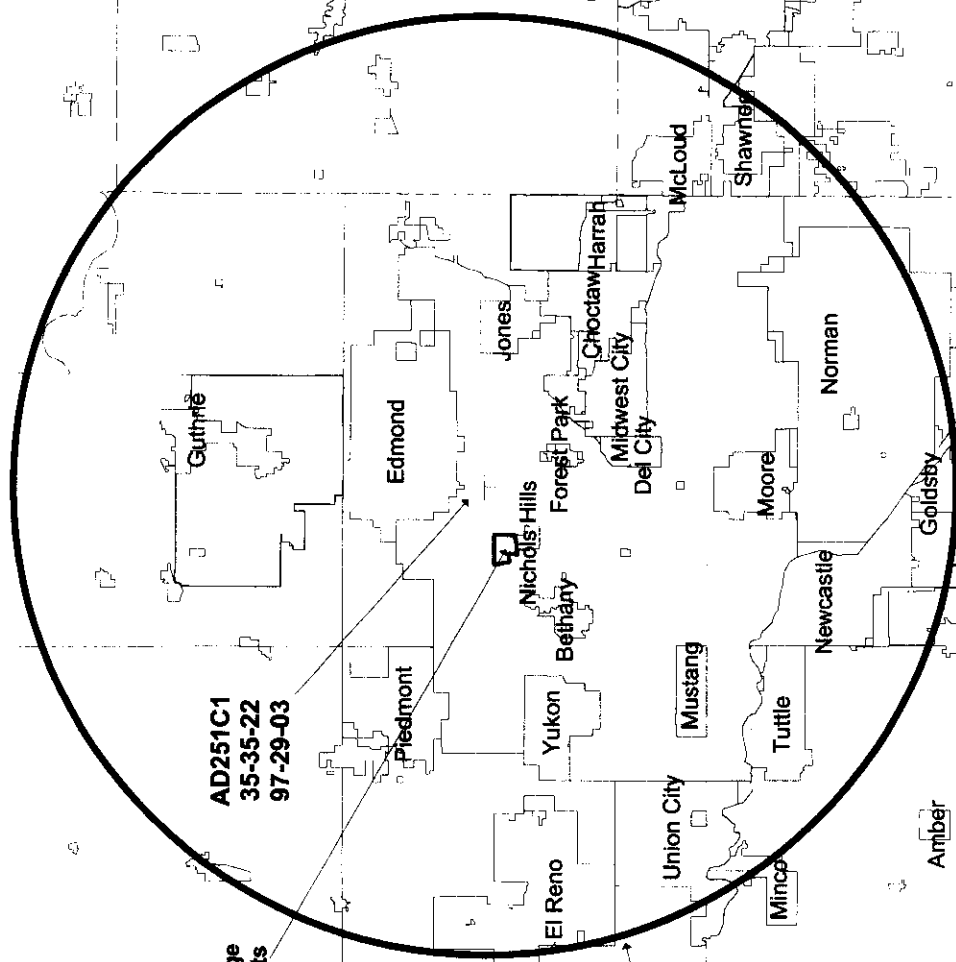
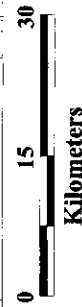
Exhibit E, Figure 1

Continued from previous page

REFERENCE				CLASS = C1		DISPLAY DATES		
35 35 22 N						DATA 05-03-05		
97 29 03 W				Current Spacings		SEARCH 05-04-05		
----- Channel 251 - 98.1 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	

RADD	ADD	249A	Purcell	OK	73.42	170.7	75.0	-1.58
Of No Concern:								
Errant database entry from MM Docket 00-148								
ADD	PRO	249A	Hennessey	OK	75.00	323.6	75.0	0.00
Of Note:								
Modified reference for Ch 249A at;								
NL: 36-07-55, WL: 97-58-46								
AP252	APP	252C1	Kiowa	KS	182.18	330.8	177.0	5.18
VA252	VAC	252C1	Kiowa	KS	182.18	330.8	177.0	5.18
AL250	RSV	250A	Cache	OK	144.98	222.8	133.0	11.98
KJMZ.A	APP	250A	Cache	OK	147.20	221.4	133.0	14.20
Of Note:								
Final community, channel and class for								
KJMZ shown as short spaced previously								
KFYZFM	APP	251A	Bennington	OK	217.57	141.7	200.0	17.57
KUSN	LIC-N	251C3	Dearing	KS	231.05	42.5	211.0	20.05
AL253	RSV	253C3	Apache	OK	103.09	221.5	76.0	27.09
KACO.A	APP-N	253C3	Apache	OK	108.39	228.6	76.0	32.39
KRBB	LIC	250C	Wichita	KS	242.85	359.5	209.0	33.85
KVOOFM	LIC	253C	Tulsa	OK	141.88	61.4	105.0	36.88
RDEL	DEL	248C	Tulsa	OK	142.10	61.2	105.0	37.10
KMODFM	LIC	248C	Tulsa	OK	142.10	61.2	105.0	37.10
KBOC.A	APP	252C0	Bridgeport	TX	238.77	180.0	196.0	42.77
AL252	RSV	252C0	Bridgeport	TX	238.77	180.0	196.0	42.77
KRBB.A	APP	250C0	Wichita	KS	242.85	359.5	196.0	46.85
RADD	ADD	248C0	Tulsa	OK	142.10	61.2	94.0	48.10

**KKWD, The Village, OK
70 dBu Contour Map**



**AD251C1
35-35-22
97-29-03**

**The Village
City Limits**

**Class C1
70 dBu Contour**

Exhibit E, Figure 2

**KKWD, The Village, OK
Gain/Loss Study**

Pop. Gain - 390,898
Pop. Loss - 0
Area Gain - 13,959 sq km
Area Loss - 0 sq km

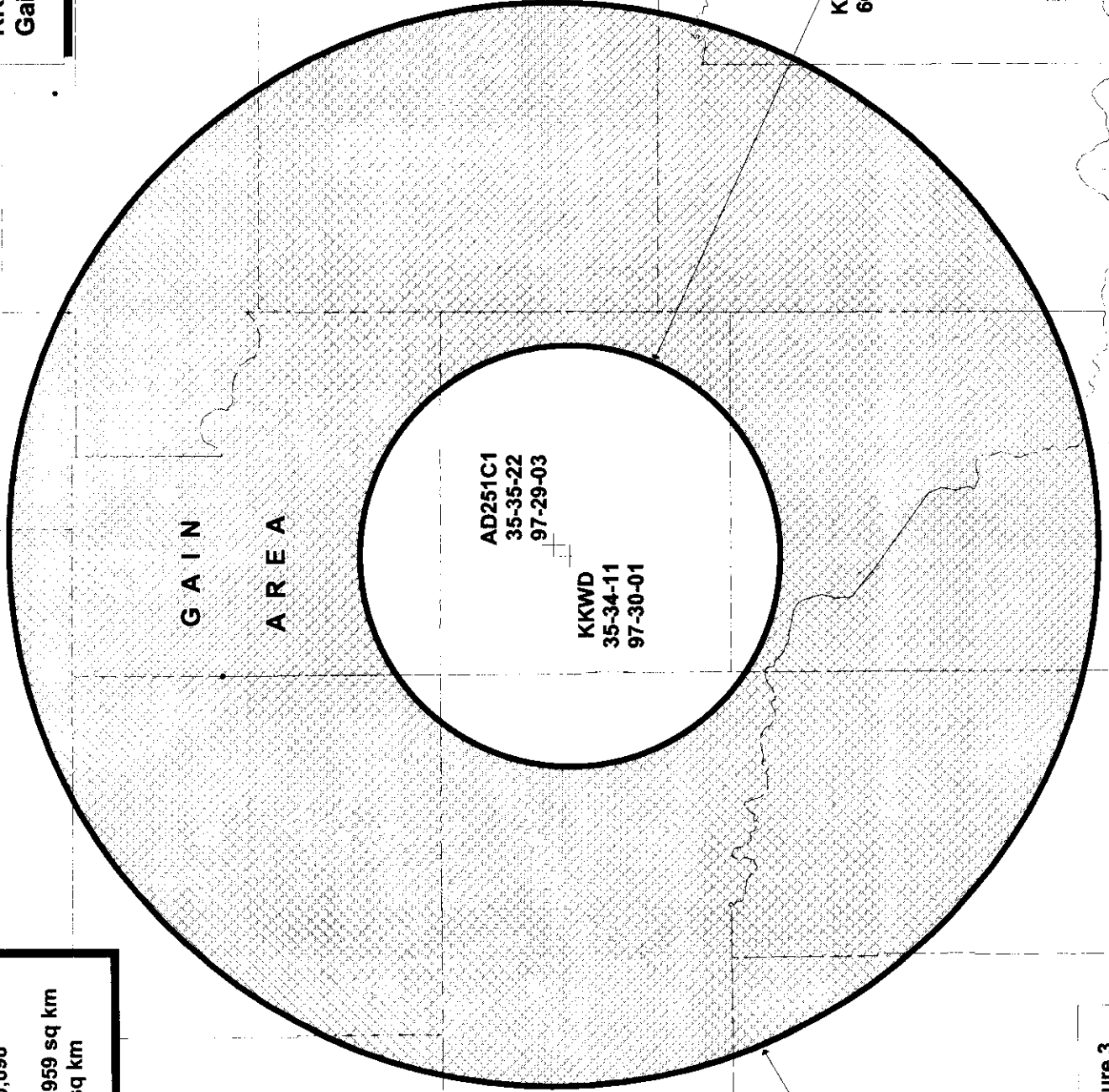


Exhibit E, Figure 3

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Substituting Ch 266A for Ch 251A at Stillwater, OK (KVRO)
(Using licensed site of KVRO as reference)

REFERENCE				CLASS = A			DISPLAY DATES	
36 13 10 N				Current			DATA	05-03-05
97 09 47 W				Spacings			SEARCH	05-04-05
----- Channel 266 - 101.1 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	

KPNC	LIC	265A	Ponca City	OK	50.17	9.3	72.0	-21.83
Of Concern:								
Substitution of Ch 264C3 proposed with								
site reference change. See KPNC.P below.								
KWOX.A	APP	266C	Woodward	OK	205.54	272.2	226.0	-20.46
KWOX	LIC	266C	Woodward	OK	205.54	272.2	226.0	-20.46
Of Concern:								
Class and site change proposed. See								
KWOX.P shown below.								
KATTFM	LIC	263C	Oklahoma City	OK	75.67	202.5	95.0	-19.33
RDEL	DEL	263C	Oklahoma City	OK	75.67	202.5	95.0	-19.33
Of Concern:								
Reclassification to class C1 proposed.								
See KATT.P shown below								
KWOX.P	PRO	266C	Woodward	OK	225.53	274.5	226.0	-0.47
Of Note:								
Modified site and class of KWOX @;								
NL: 36-24-16, WL: 99-39-50								
KATT.P	PRO	263C1	Oklahoma City	OK	75.67	202.5	75.0	0.67
Of Note:								
Reclassified facility of KATT.P at								
present KATT licensed site								
KFDIFM	LIC	267C	Wichita	KS	178.07	349.5	165.0	13.07
KXOJFM	LIC	265A	Sapulpa	OK	97.22	100.2	72.0	25.22
RADD	ADD	268C3	Waukomis	OK	67.47	279.4	42.0	25.47
KEOJ	LIC	266A	Caney	KS	140.78	53.1	115.0	25.78
KPNC.P	PRO	264C3	Ponca City	OK	69.39	5.9	42.0	27.39
Of Note:								
Modified channel, class and site of KPNC proposed @;								
NL: 36-50-29, WL: 97-04-59								

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Substituting Ch 264C3 for Ch 266A Ponca City, OK - (KPNC)
(MX Channel, site and class change proposed for KPNC)

REFERENCE				CLASS = C3		DISPLAY DATES	
36 50 29 N				Current		DATA	05-03-05
97 04 59 W				Spacings		SEARCH	05-04-05
----- Channel 264 - 100.7 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin

Community of	Ponca City		OK	14.95	180.7		
Reference Coordinates:							
North Latitude: 36-42-24							
West Longitude: 97-05-07							
KPNC LIC 265A	Ponca City		OK	19.54	177.2	89.0	-69.46
Of No Concern:							
Licensed facility of KPNC							
Before proposed modifications							
KATTFM LIC 263C	Oklahoma City		OK	143.52	194.6	176.0	-32.48
RDEL DEL 263C	Oklahoma City		OK	143.52	194.6	176.0	-32.48
RADD ADD 263C0	Oklahoma City		OK	143.52	194.6	163.0	-19.48
Of Concern:							
Reclassification of KATT to class C1 proposed.							
See KATT.P below							
KATT.P PRO 263C1	Oklahoma City		OK	143.52	194.6	144.0	-0.48
Of Note:							
KATT as class C1 at licensed site							
AP263 APP 263A	Augusta	KS	89.71	5.6	89.0	0.71	
AP263 APP 263A	Augusta	KS	94.30	5.8	89.0	5.30	
AL263 VAC 263A	Augusta	KS	94.30	5.8	89.0	5.30	
AL264 RSV 264A	Chelsea	OK	150.27	103.1	142.0	8.27	
KTFR LIC 264A	Chelsea	OK	151.47	103.9	142.0	9.47	
KFDIFM LIC 267C	Wichita	KS	113.24	339.6	96.0	17.24	
KYFM LIC 261C2	Bartlesville	OK	83.15	106.3	56.0	27.15	
KVRO.P PRO 266A	Stillwater	OK	69.39	185.9	42.0	27.39	
Of Note:							
Substitution of Ch 266A for Ch 251A proposed							
at KVRO licensed site.							
KHOK LIC 264C1	Hoisington	KS	240.57	322.5	211.0	29.57	
KXOJFM LIC 265A	Sapulpa	OK	123.54	134.4	89.0	34.54	

KPNC, Ponca City, OK 70 dBu Contour Map

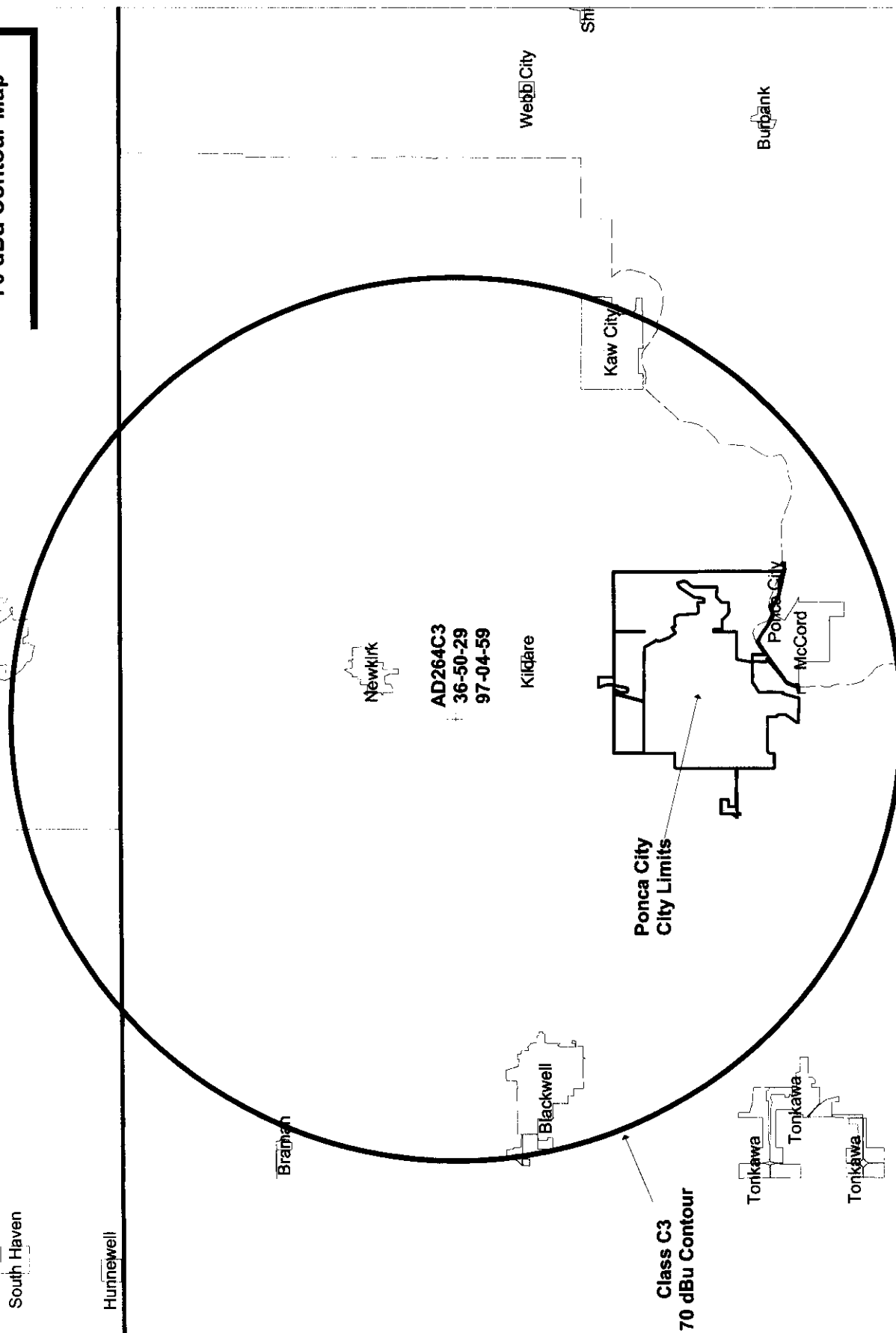


Exhibit E, Figure 6

Pop. Gain - 21,673
Pop. Loss - 613
Area Gain - 2,912 sq km
Area Loss - 217 sq km

KPNC, Ponca City, OK Gain/Loss Study Map

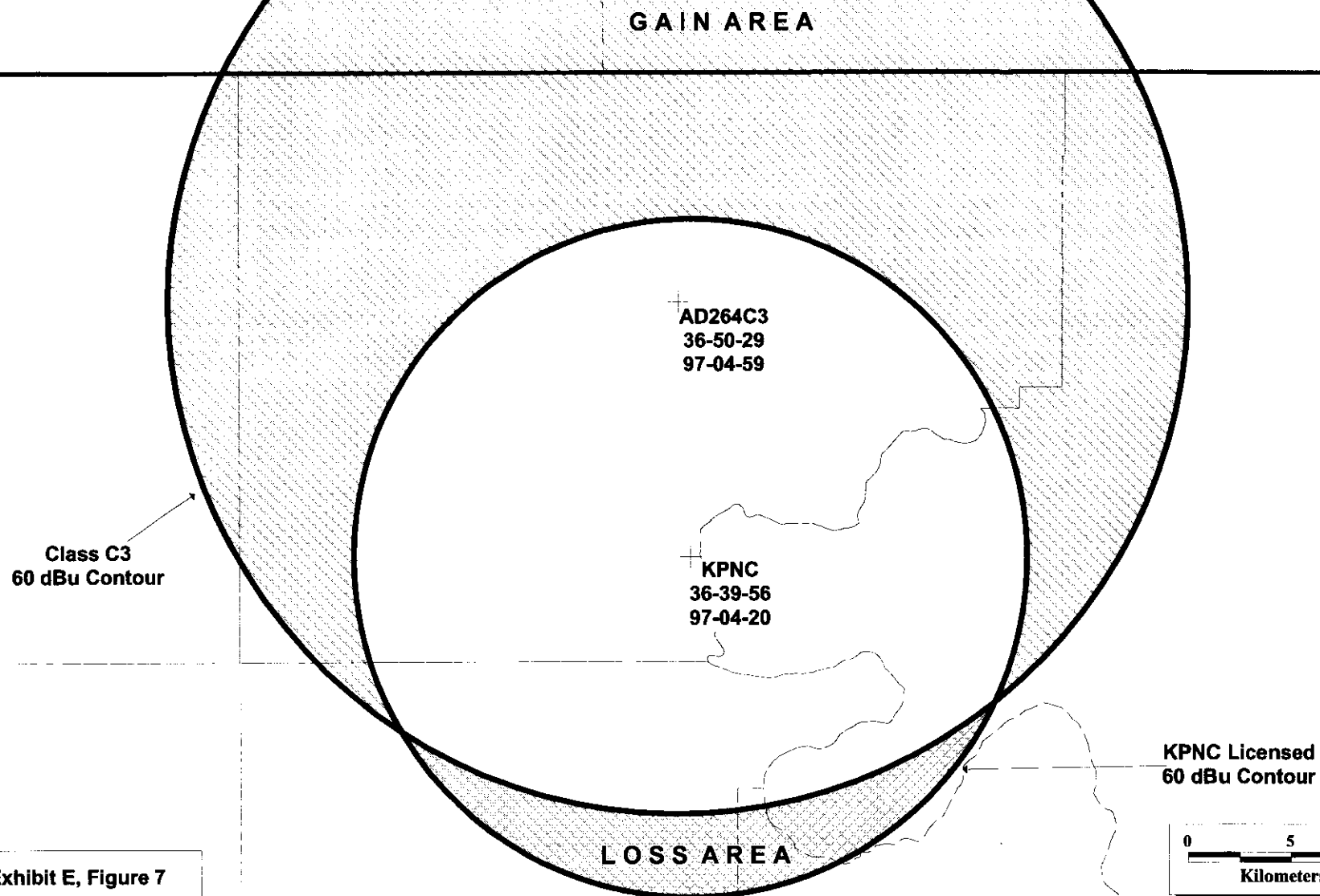


Exhibit E, Figure 7

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL

MB Docket 05-136, RM-11163
 KKWD 251C1 The Village, OK
 Citadel Broadcasting Company

Ch 266C reference Woodward, OK - (KWOX)
 (Modifying KWOX reference site to avoid short spacing)

REFERENCE				CLASS = C		DISPLAY DATES		
36 24 16 N				Current	Spacings	DATA	05-03-05	
99 39 50 W				Channel 266 - 101.1 MHz		SEARCH	05-05-05	
Call	Channel	Location		Dist	Azi	FCC	Margin	
Community of Woodward				OK 24.7	82.4			
Reference Coordinates:								
North Latitude: 36-26-01								
West Longitude: 99-23-23								
KWOX	LIC	266C	Woodward	OK	24.51	128.1	290.0	-265.49
KWOX.A	APP	266C	Woodward	OK	24.51	128.1	290.0	-265.49
Of No Concern:								
Licensed facility of KWOX before site								
Modification proposed in instant counterproposal								
KVRO.P	PRO	266A	Stillwater	OK	225.53	94.5	226.0	-0.47
Of Note:								
Substitution Of Ch 266A for Ch 251A								
Proposed in instant counterproposal @;								
NL: 36-13-10, WL: 97-09-47								
AL267	VAC	267C3	McLean	TX	176.41	214.0	176.0	0.41
KFDIFM	LIC	267C	Wichita	KS	244.42	50.0	241.0	3.42
RDEL	DEL	267C	Wichita	KS	244.42	50.0	241.0	3.42
AL264	VAC	264C2	Reydon	OK	114.59	189.7	105.0	9.59
KXGL.C	CP -N	265C0	Amarillo	TX	231.26	239.0	220.0	11.26
AL269	VAC	269C2	Sayre	OK	123.55	179.0	105.0	18.55
KSLs	LIC	268C1	Liberal	KS	125.39	305.6	105.0	20.39
KLAW	LIC-N	267C1	Lawton	OK	229.70	153.4	209.0	20.70
KREJ	LIC	269C2	Medicine Lodge	KS	128.25	43.8	105.0	23.25
KXGL	LIC	265C1	Amarillo	TX	232.79	238.8	209.0	23.79
RADD	ADD	267C0	Wichita	KS	244.42	50.0	220.0	24.42
KIXCFM	LIC	265C2	Quanah	TX	238.83	176.4	188.0	50.83
RADD	ADD	268C3	Waukomis	OK	158.23	93.1	96.0	62.23
KPNC	LIC	265A	Ponca City	OK	233.89	82.1	165.0	68.89

KWOX, Woodward, OK 70 dBu Contour Map

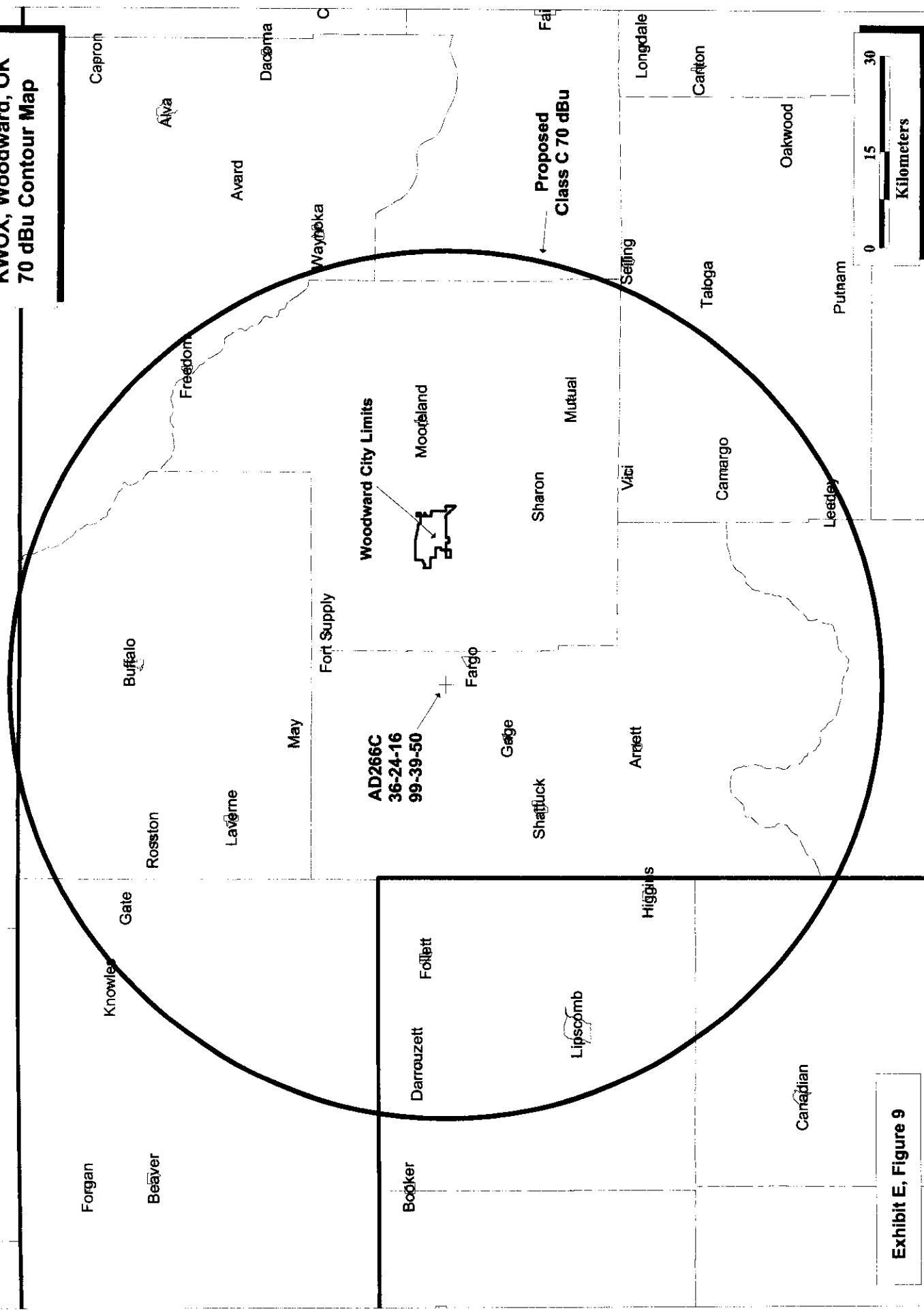


Exhibit E, Figure 9

Pop. Gain - 10,501
Pop. Loss - 1,268
Area Gain - 8,737 sq km
Area Loss - 1,034 sq km

KWOX, Woodward, OK
Gain/Loss Study

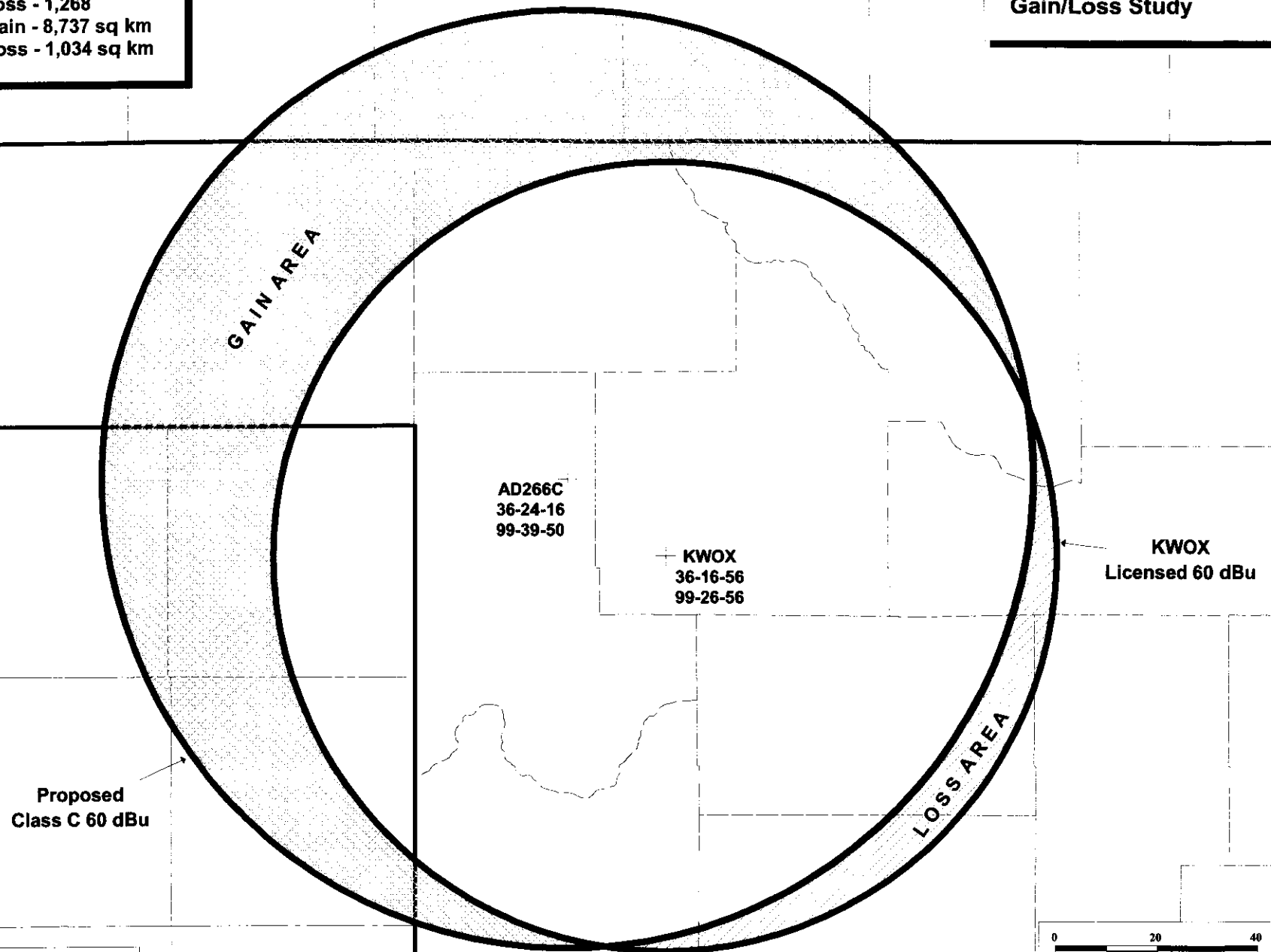


Exhibit E, Figure 10

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Substituting Ch 263C1 for Ch 263C Oklahoma City, OK - (KATT)

(Depicting full spacing to Ch 266A at Stillwater and Ch 264C3 at Ponca City, OK)

REFERENCE	CLASS = C1	DISPLAY DATES
35 35 22 N		DATA 05-03-05
97 29 03 W	Current Spacings	SEARCH 05-04-05

----- Channel 263 - 100.5 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
------	---------	----------	------	-----	-----	--------

Community of	Oklahoma City	OK	13.87	192.0		
--------------	---------------	----	-------	-------	--	--

Reference Coordinates:

North Latitude: 35-28-02

West Longitude: 97-30-58

RDEL	DEL	263C	Oklahoma City	OK	0.00	0.0	270.0	-270.00
KATTFM	LIC	263C	Oklahoma City	OK	0.00	0.0	270.0	-270.00
RADD	ADD	263C0	Oklahoma City	OK	0.00	0.0	259.0	-259.00

Of No Concern:

Reclassification to C1 status requested
in instant counterproposal

KPNC.P PRO	264C3	Ponca City	OK	143.52	14.4	144.0	-0.48
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Of Note:

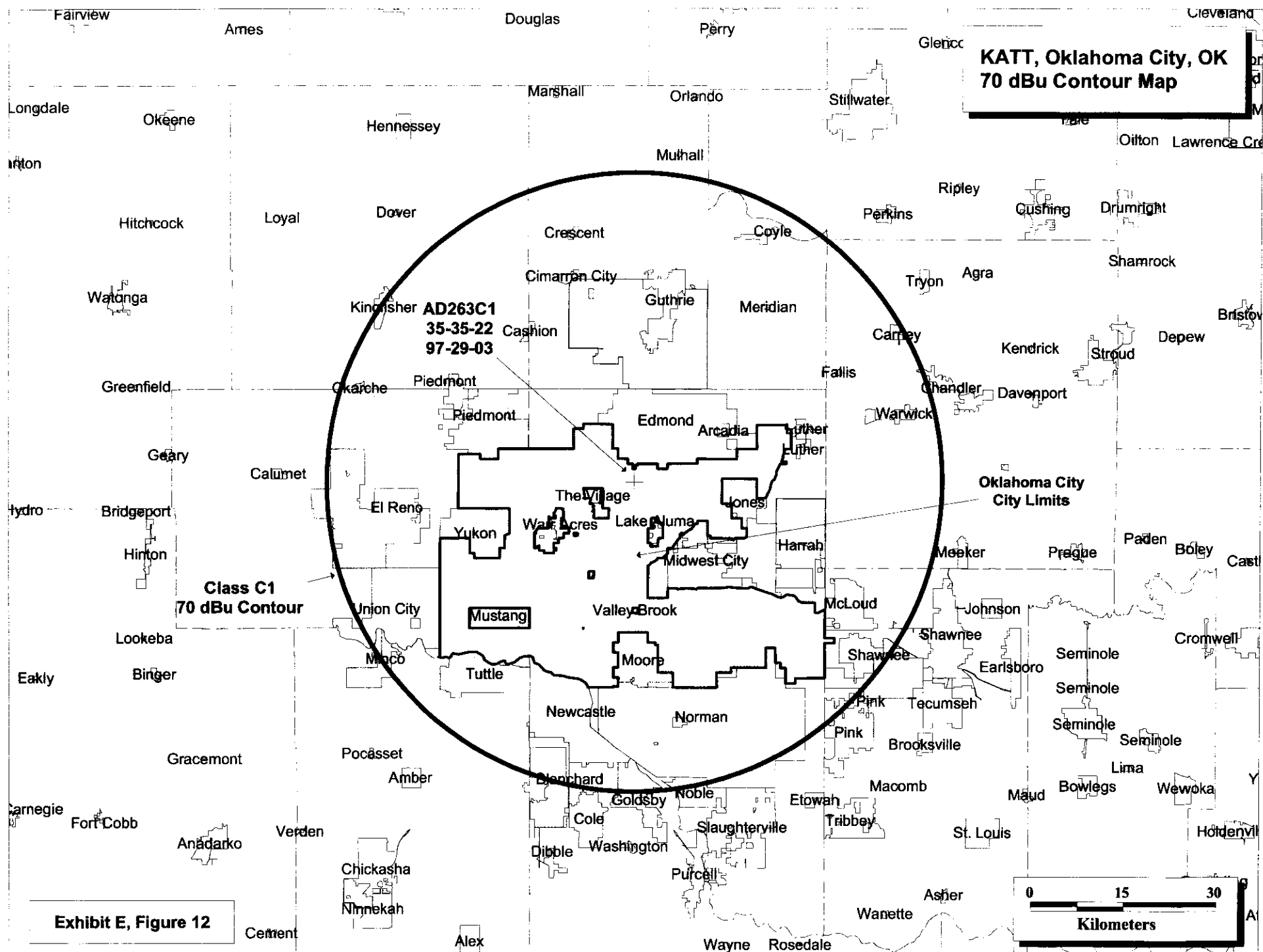
Proposed modified channel, class and site
for KPNC @; NL: 36-50-29; WL: 97-04-59

KVRO.P PRO	266A	Stillwater	OK	75.67	22.3	75.0	0.67
------------	------	------------	----	-------	------	------	------

Of Note:

Proposed channel substitution for
KVRO at licensed site

RADD	ADD	263A	Clayton	OK	215.10	122.1	200.0	15.10
KYKC	LIC	261C2	Byng	OK	104.73	141.2	79.0	25.73
KWRDFM	LIC-N	264C	Highland Village	TX	235.57	165.2	209.0	26.57
RADD	ADD	265A	Holdenville	OK	104.47	122.5	75.0	29.47
RADD	ADD	266A	Pauls Valley	OK	107.39	161.0	75.0	32.39
AP263	APP	263A	Augusta	KS	232.54	10.9	200.0	32.54
KJCM	LIC	262C3	Snyder	OK	179.59	234.6	144.0	35.59
AL263	VAC	263A	Augusta	KS	237.14	10.9	200.0	37.14
AP263	APP	263A	Augusta	KS	237.14	10.9	200.0	37.14
KCXR	LIC	262A	Taft	OK	174.99	81.3	133.0	41.99
RADD	ADD	260C1	Alva	OK	131.65	328.3	82.0	49.65



**KATT, Oklahoma City, OK
Gain/Loss Study**

Pop. Gain - 0
Pop. Loss - 38,552
Area Gain - 0 sq km
Area Loss - 2,204 sq km

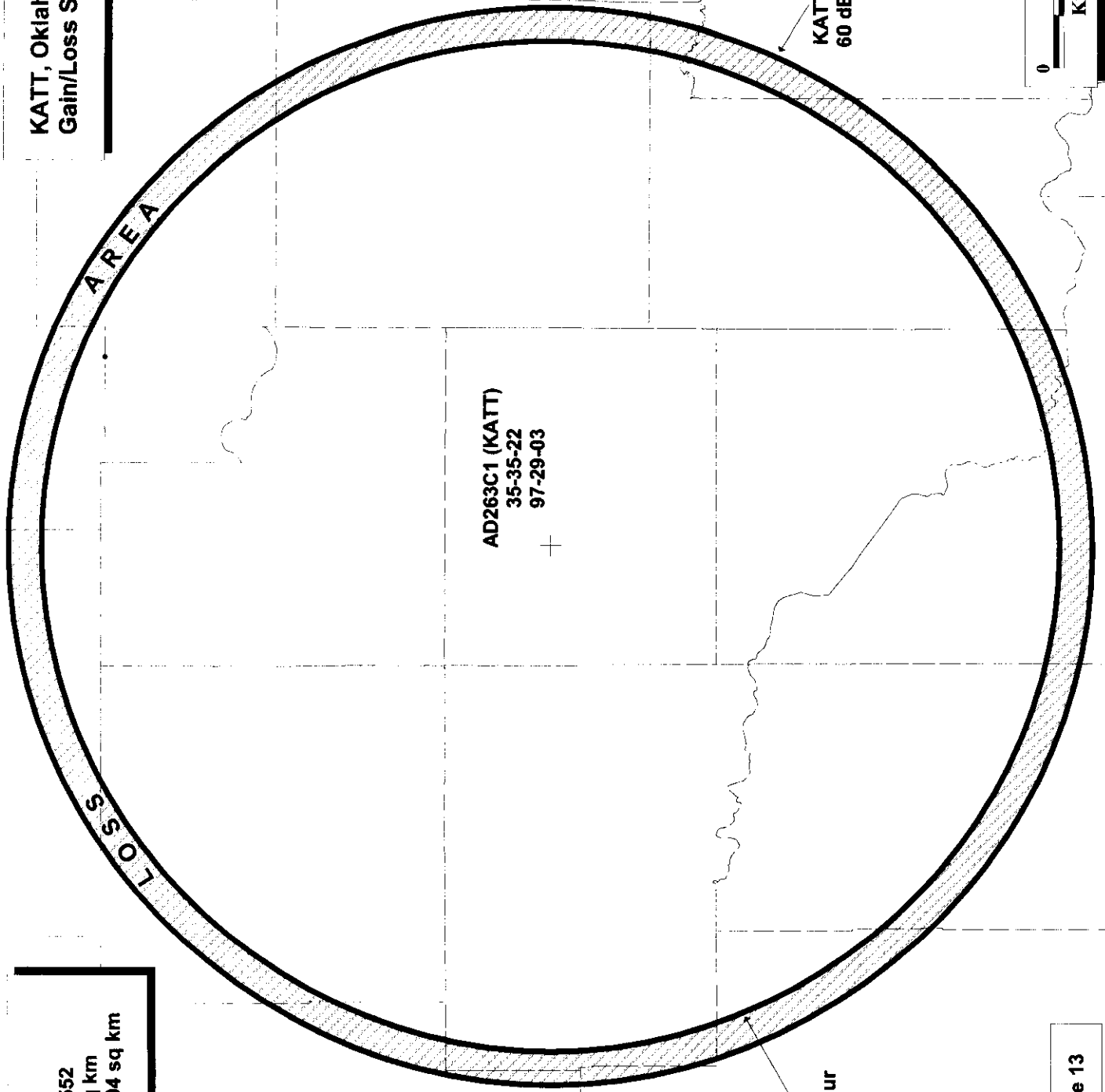


Exhibit E, Figure 13

ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL



MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Modify 249A Hennessey, OK - (ADD 249A)

REFERENCE					DISPLAY DATES		
36 07 55 N			CLASS = A		DATA	05-03-05	
97 58 46 W			Current Spacings		SEARCH	05-04-05	
----- Channel 249 - 97.7 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	

Community of	Hennessey		OK	7.76	109.3		
Reference Coordinates:							
North Latitude: 36-06-32							
West Longitude: 97-53-53							
RADD	ADD	249A	Hennessey	OK	3.94	146.1	115.0 -111.06
Of No Concern:							
Proposed allotment reference before							
instant counterproposal.							
AL249	VAC	249A	Vici	OK	118.67	271.3	115.0 3.67
KKWD	LIC	250A	Edmond	OK	75.93	145.2	72.0 3.93
KMODFM	APP	248C	Tulsa	OK	169.44	87.0	165.0 4.44
RDEL	DEL	248C	Tulsa	OK	169.44	87.0	165.0 4.44
KMODFM	LIC	248C	Tulsa	OK	169.44	87.0	165.0 4.44
AP252	APP	252C1	Kiowa	KS	81.86	323.7	75.0 6.86
KPAK	LIC	248C2	Alva	OK	117.65	327.6	106.0 11.65
RADD	ADD	248C0	Tulsa	OK	169.44	87.0	152.0 17.44
KRBB	LIC	250C	Wichita	KS	187.36	12.7	165.0 22.36
AP252	APP	252C1	Kiowa	KS	107.58	335.8	75.0 32.58
AP252	APP	252C1	Kiowa	KS	108.16	335.4	75.0 33.16
VA252	VAC	252C1	Kiowa	KS	108.16	335.4	75.0 33.16
RDEL	DEL	252C1	Kiowa	KS	108.16	335.4	75.0 33.16
KRBB.C	CP	250C0	Wichita	KS	187.36	12.7	152.0 35.36
KVRO	LIC	251A	Stillwater	OK	74.09	82.2	31.0 43.09
KWEYFM	LIC	247C1	Weatherford	OK	118.98	230.3	75.0 43.98
RDEL	DEL	247C1	Weatherford	OK	118.98	230.3	75.0 43.98
R---		247A	Thomas	OK	78.64	235.9	31.0 47.64

**Channel 249A, Hennessey, OK
70 dBu Contour Map**

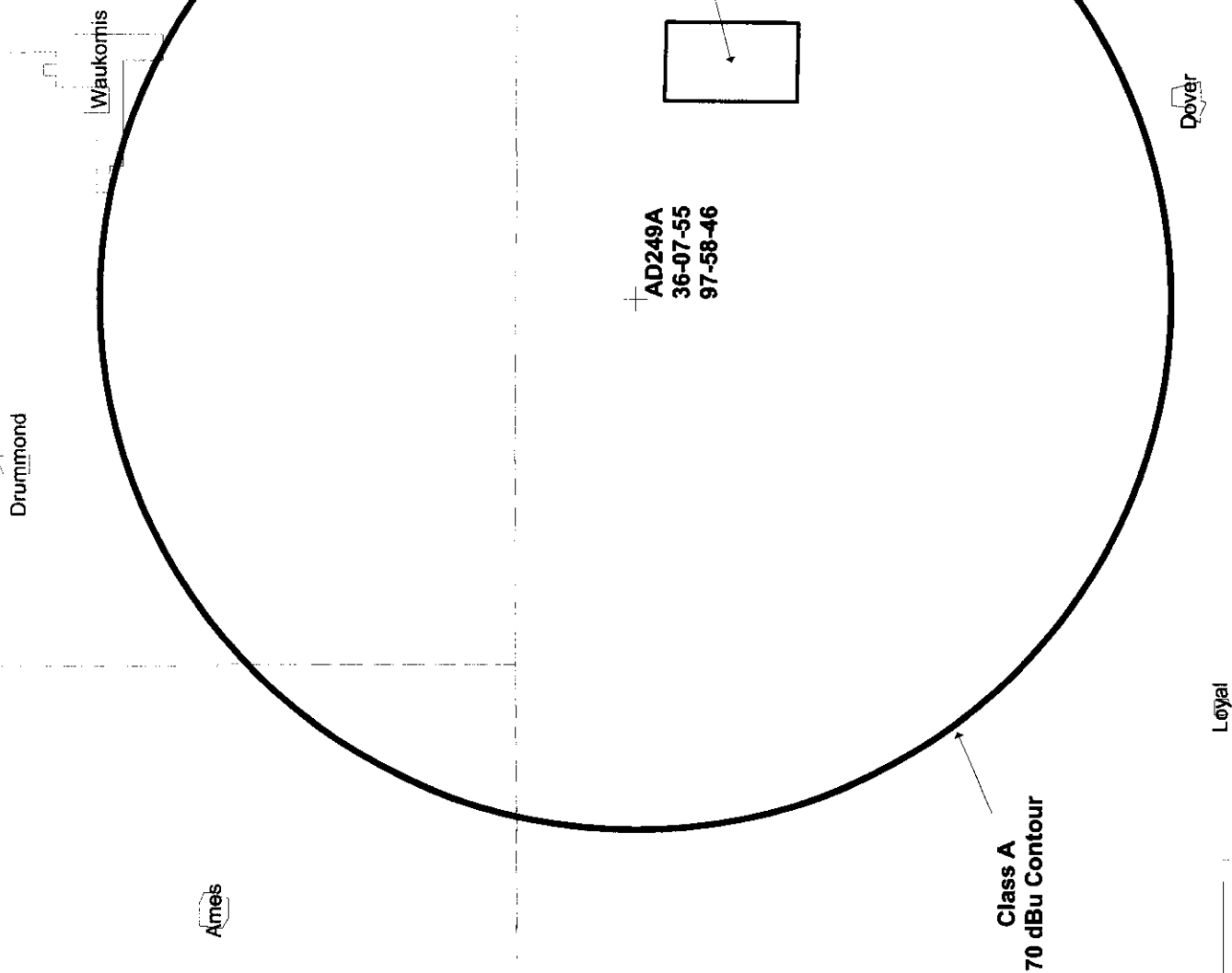


Exhibit E, Figure 15

**ENGINEERING STATEMENT
In Support of a
COUNTERPROPOSAL**

MB Docket 05-136, RM-11163
KKWD 251C1 The Village, OK
Citadel Broadcasting Company

Cumulative Gain/Loss Studies

<u>City</u>	<u>Loss Area (sq. km)</u>	<u>Gain Area (sq. km)</u>	<u>Pop. Loss (2000)</u>	<u>Pop. Gain (2000)</u>
The Village, Oklahoma	0	13,959	0	390,898
Ponca City, Oklahoma	217	2,912	613	21,673
Woodward, Oklahoma	1,034	8,737	1,268	10,501
Oklahoma City, Oklahoma	2,204	0	38,552	0
Totals	3,455	25,608	40,433	423,072

Net Area Gain: 22,153 sq. km
Net Population Gain: 382,639

EXHIBIT B



U.S. Census Bureau

American FactFinder

FACT SHEET

The Village city, Oklahoma

Census 2000 Demographic Profile Highlights:

General Characteristics - show more >>

	Number	Percent	U.S.		
Total population	10,157	100.0	100%	map	brief
Male	4,719	46.5	49.1%	map	brief
Female	5,438	53.5	50.9%	map	brief
Median age (years)	34.8	(X)	35.3	map	brief
Under 5 years	784	7.7	6.8%	map	
18 years and over	8,108	79.8	74.3%		
65 years and over	1,655	16.3	12.4%	map	brief
One race	9,778	96.3	97.6%		
White	8,145	80.2	75.1%	map	brief
Black or African American	1,063	10.5	12.3%	map	brief
American Indian and Alaska Native	258	2.5	0.9%	map	brief
Asian	194	1.9	3.6%	map	brief
Native Hawaiian and Other Pacific Islander	3	0.0	0.1%	map	brief
Some other race	115	1.1	5.5%	map	
Two or more races	379	3.7	2.4%	map	brief
Hispanic or Latino (of any race)	383	3.8	12.5%	map	brief
Household population	10,152	100.0	97.2%	map	brief
Group quarters population	5	0.0	2.8%	map	
Average household size	2.12	(X)	2.59	map	brief
Average family size	2.76	(X)	3.14	map	
Total housing units	4,997	100.0	100.0%	map	
Occupied housing units	4,778	95.6	91.0%		brief
Owner-occupied housing units	3,185	66.7	66.2%	map	
Renter-occupied housing units	1,593	33.3	33.8%	map	brief
Vacant housing units	219	4.4	9.0%	map	

Social Characteristics - show more >>

	Number	Percent	U.S.		
Population 25 years and over	7,103	100.0			
High school graduate or higher	6,380	89.8	80.4%	map	brief
Bachelor's degree or higher	2,269	31.9	24.4%	map	
Civilian veterans (civilian population 18 years and over)	1,244	15.5	12.7%	map	brief
Disability status (population 21 to 64 years)	1,122	18.2	19.2%	map	brief
Foreign born	351	3.4	11.1%	map	brief
Male, Now married (population 15 years and over)	2,177	57.3	56.7%		brief
Female, Now married (population 15 years and over)	2,223	48.8	52.1%		brief

Speak a language other than English at home (population 5 years and over)	617	6.5	17.9%	map	brief
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Economic Characteristics - show more >>

	Number	Percent	U.S.		
In labor force (population 16 years and over)	5,739	69.2	63.9%		brief
Mean travel time to work in minutes (population 16 years and over)	20.2	(X)	25.5	map	brief
Median household income (dollars)	37,559	(X)	41,994	map	
Median family income (dollars)	44,632	(X)	50,046	map	
Per capita income (dollars)	20,444	(X)	21,587	map	
Families below poverty level	196	7.2	9.2%	map	brief
Individuals below poverty level	1,017	10.1	12.4%	map	

Housing Characteristics - show more >>

	Number	Percent	U.S.		
Single-family owner-occupied homes	3,064	100.0			brief
Median value (dollars)	68,500	(X)	119,600	map	brief
Median of selected monthly owner costs	(X)	(X)			brief
With a mortgage	683	(X)	1,088	map	
Not mortgaged	245	(X)	295		

(X) Not applicable.

Source: U.S. Census Bureau, Summary File 1 (SF 1) and Summary File 3 (SF 3)

U.S. Census Bureau

American FactFinder

P27. PLACE OF WORK FOR WORKERS 16 YEARS AND OVER--PLACE LEVEL [5] - Universe:

Workers 16 years and over

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and definitions see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

	The Village city, Oklahoma
Total:	5,377
Living in a place:	5,377
Worked in place of residence	675
Worked outside place of residence	4,702
Not living in a place	0

U.S. Census Bureau
Census 2000

Standard Error/Variance documentation for this dataset:

Accuracy of the Data: Census 2000 Summary File 3 (SF 3) - Sample Data (PDF 141.5KB)



Meeting & Agendas
Public Safety
Environmental
Ordinances & Regulations
City Council & Administration
Utilities
Community Service
Employment Opportunities
Information About The Village
Awards & Recognition
Downloads

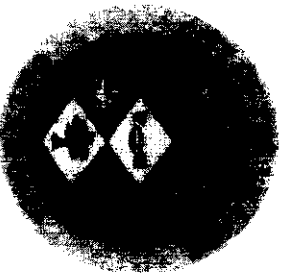
2006 Election Results

Mayor Wayne Schooley

<http://www.thevillageok.org/>

"Government is a trust, and the officers of the government are trustees and both the trust and the trustees are created for the benefit of the people."

Henry Clay



Oklahoma City, OK

Get the 10 day forecast



61°F
Cloudy

Feels Like: 61°F

Humidity: 81%

Wind: S at 12 mph

Enter city/zip



Airport Delays
Sporting Events
Pollen Reports

Download Desktop Weather

The Village City Council
Working Working Working For You!

Bubba Symes Ward 2

Stan Alexander Ward 3

5/5/2005